

STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

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Colorado Department
of Public Health
and Environment

December 13, 2000

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Reports (RLCRs) and other concerns for the Southside Buildings

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) would like to address concerns with the decommissioning process and lack of RLCRs for the Southside Buildings.

Information provided during the Project Coordinators Meeting on December 4, 2000, as well as the "Remediation, Industrial and Site Services Project Management Plan", dated August 31, 2000 (the Southside PMP), indicate decommissioning activities are ongoing and will continue in several Southside Buildings through FY01. This activity of concern to the Division includes removal of property/office furniture, loose material, and equipment (both loose and fixed) as well as hazard reduction/removal, which includes removal of beryllium material/waste, waste oil, and depleted Uranium waste in drums. This activity is indicated to be conducted in Buildings 444, 865, 881, and 886, which have all been identified as possible Type 2 Buildings.

During numerous discussions with site personnel and review of these documents, continuing concerns with the decommissioning process emerge. Specifically, what activities are decommissioning and when should a RLCR be performed?

The decommissioning process for Type 2 Buildings identified in the DPP (Section 3.3.6) is:

- 1) Perform "scoping" and the Reconnaissance Level Characterization (RLC) and provide the RLCR, which will properly identify the hazards in each of these buildings and provide the specific Typing for each of these buildings. This is required per RFCA Attachment 9 and Section 3.3.4 of the Decommissioning Program Plan (DPP).
- 2) Prepare a Plan utilizing the RLCR for decommissioning the Type 2 buildings or cluster of buildings. Based on the necessary activities to complete the decommissioning, the site may utilize approved RSOPs as well as Section 1.1.5 of the DPP, or decommissioning may only proceed pursuant to an approved PAM or IM/IRA.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

1/3

ADMIN RECORD

1A-A-000700

According to RFCA and the DPP, the activity in all buildings is either 1) mission related, 2) deactivation, or 3) decommissioning. Deactivation only applies to buildings that have SNM, which are generally the Type 3 Buildings, not to Type 2 Buildings (Attachment 9 & DPP Sections 1, 1.1.2, & 2.3.2). However, some specific deactivation related to SNM concerns may occur in Type 2 Buildings without causing these buildings to be categorized as Type 3 Buildings (DPP Section 2.2). As such, deactivation does not apply to Southside buildings. Therefore, all activity in Southside Buildings is decommissioning activity, unless there is a continuing mission, such as storage. It should also be noted that all decommissioning activity requires specific regulator involvement.

Also, according to the DPP Section 3.3.4 a RLCR must be completed prior to initiating Decommissioning or Mothballing of Buildings. However, as requested by RFETS we have approved limited activities prior to performing a RLCR. These include; removal of "office" equipment (tables, chairs, etc), removal of "loose" equipment and other such items, and removal of containerized hazardous wastes and loose materials (hazard reduction).

We have also agreed to limited specific removal activities after consultation and concurrence. These include, removal of specific fixed equipment, removal of stools, sinks and other restroom fixtures in non-contaminated areas and specific janitors sinks. In addition we have also agreed with specific changes to building systems including draining internal water and changes to the fire suppression system to an on demand system, as well as, changes to building heating systems.

The rationale for agreeing with or allowing the above activities comes from Sections 1.1.4 & 1.1.5 of the DPP. However, since these sections are a part of the Decommissioning Program Plan, all of these activities are decommissioning activities, not deactivation (or stabilization), and a RLCR should be performed prior to initiating these activities.

Therefore, and because the current actions proposed by RFETS will remove most if not all materials and equipment from the Southside buildings, leaving basically an empty shell, we are concerned with when an RLCR should be performed, a plan generated, and how much decommissioning work should be performed prior to performing the RLCR and generation of the decommissioning plan. This is of particular concern since the RLCR was intended to identify all of the physical and contamination hazards as well as properly Typing the buildings and planning the necessary decommissioning activities prior to initiating decommissioning activities.

In addition, since the current actions may also include rather large-scale decontamination activities of rooms and building surfaces per the CBDPP process, a RLCR should be performed prior to performing these decontamination activities. The decontamination of building surfaces, even if performed according to the CBDPP, is a decommissioning activity (unless in a building or the part of a building with a specific mission, not undergoing D&D). Therefore, since the CBDPP process is intended to support normal/ongoing building mission activities and has been indicated as insufficient for D&D activities, the CBDPP decontamination processes for building surfaces (a decommissioning activity) should not be performed prior to the RLCR without specific regulator concurrence.

Because an RLCR has not been performed in any of the Southside buildings of concern, except for B886 (which is being decommissioned under an IM/IRA), we are concerned with the ongoing decommissioning activities occurring and proposed in the Southside buildings. As such, and for safety concerns we must limit the activities for which we will concur prior to producing a RLCR and generating a decommissioning plan.

These concerns were recently brought to light during a tour of B865 on December 12, 2000. We have previously concurred with the request to remove some fixed equipment not attached to building ventilation or plumbing systems, and three small pieces of equipment that were attached to the internal building vacuum system. However, most of the ceiling tiles (some contaminated) have been removed and large areas have been decontaminated, and additional decontamination as well as removal of some piping (air and potable water) was indicated to be in the works. These are all decommissioning activities requiring previous concurrence. We were not provided any notice, or IWCPs, for the ceiling tile removal nor the decontamination activities that have occurred, nor have we been provided any such information on the currently proposed activities for our concurrence.

Until RLCRs have been performed, the decommissioning activities in Southside buildings should be limited to property removal (office equipment such as tables, chairs, etc), removal of small free standing equipment and other such items, and removal of containerized wastes and loose materials. Specific fixed equipment may also be removed and localized decontamination of building surfaces may be performed after consultation and with our concurrence.

The Division requests that RFETS provide schedules for performing the RLCRs to appropriately support the decommissioning activities for Southside buildings. The Division is specifically concerned with performing the RLCR for B865 as soon as possible since this building may be "mothballed" once the material removal activities are completed (currently scheduled for May, 00), as well as for B881, 883, and 444 since decommissioning activities are currently occurring or proposed. We request these schedules be provided to us within 30 days.

If you have any questions regarding this correspondence please contact me at (303) 692-3367.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FCG, RFFO
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